REMARKS

Claim 1 has been amended to call for optically programming a phase change memory after

electrically programming a phase change memory. This is consistent with the disclosure of the

present application which suggests interchangeable optical and electrical programming.

Both of the cited references teach away from this concept. Nangle, for one, teaches only

initially optically programming the memory and, thereafter, exclusively electrically programming

the memory. Similarly, Lu teaches away from the claimed invention by suggesting only optically

programming the memory.

It is respectfully submitted that nothing in the prior art teaches the concept of

reprogramming optically after programming electrically. Perhaps prior workers in the field have

believed that the state of the memory would become confused if one attempted to optically

program after electrically programming. That is, the system would think the memory is in one

state when, in fact, it is in another state and the system would not work. However, as pointed out

in the present application, by simply checking the state of the cell before reprogramming it, this

inconsistency can be ameliorated.

Thus, the sum total of the prior art teaches away from the claimed invention and suggests

that what is claimed should not be attempted. To suggest that simply combining the two would

meet the claimed invention does not work because neither cited reference teaches programming

optically after programming electrically. Presumably, it was believed by the prior inventors that

this would result in an indeterminate memory state.

Therefore, reconsideration is respectfully requested.

Respectfully submitted,

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